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9   UNITED STATES DISTRICT COURT

10   NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

11

12 KELLY WILSON,   Case No. 3:14-cv-01441-VC

13   Plaintiff,   **DECLARATION OF ERIN J. COX IN**
                                           SUPPORT OF PLAINTIFF'S
14   vs.   **ADMINISTRATIVE MOTION TO FILE**
                                           UNDER SEAL
15
    THE WALT DISNEY COMPANY, DISNEY
16 ENTERPRISES, INC., WALT DISNEY   Judge: Hon. Vince G. Chhabria
    PICTURES, and WALT DISNEY MOTION   Date: April 9, 2015
17 PICTURES GROUP, INC.,   Time: 10:00 a.m.
                                           Ctrm: 4 (17th Floor)
18   Defendants.

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1   I, Erin J. Cox, declare as follows:

2   1.   I am an attorney in the law firm of Munger, Tolles & Olson LLP, counsel of record

3 for Defendants The Walt Disney Company, Disney Enterprises, Inc., Walt Disney Pictures, and

4 Walt Disney Motion Pictures Group, Inc. in this action (collectively, "Disney"). On behalf of

5 Disney, I make this declaration pursuant to Local Rule 79-5(e) to demonstrate compelling reasons

6 to file under seal unredacted versions of documents attached to Plaintiff's Administrative Motion

7 to Seal (Dkt. 129), filed on March 19, 2015. Specifically, portions of certain exhibits to the

8 Declaration of J.A. Ted Baer in Support of Plaintiff's Opposition to Defendants' Motion for

9 Summary Judgment contain material designated confidential by Disney under the Court's

10 Confidentiality Stipulation and Protective Order dated December 4, 2014 (the "Designated

11 Material"). I have personal knowledge of the facts stated herein and, if called as a witness, I could

12 and would competently testify as stated below.

Grounds for Redaction and Sealing

14   2.   Disney specifically seeks to seal the following:

15   a.   **Baer Declaration Exhibit 6**: Unredacted email sent to John Lasseter at a

16 confidential Pixar email address not known to the public; the proposed redacted version of this

17 exhibit (attached hereto as Exhibit A) has been narrowly redacted to exclude only Mr. Lasseter's

18 private email address. The selective redaction of a non-public email address of Mr. Lasseter

19 serves to protect against the public disclosure of personal information of non-parties to this

20 litigation.

21   b.   **Baer Declaration Exhibit 17**: Unredacted excerpts from the transcript of

22 Paul Briggs's deposition; the proposed redacted version of this exhibit (attached hereto as Exhibit

23 B) has been redacted to exclude one sentence quoting from confidential brainstorm meeting

24 minutes. Since the founding of the studio, Disney has used a specialized brainstorming process to

25 develop ideas. These sessions are highly confidential, and Disney protects against the public

26 disclosure of the discussions that take place in these meetings. Ideas that emerge from these

27 brainstorming sessions may inform the production of future Disney works. Disney keeps minutes

28 of these brainstorming sessions for its own purposes. Disney treats these minutes and related

1   documents and communications as confidential and does not disclose them outside the company.

2   Disney is in the business of creating and producing motion pictures and other entertainment

3   content, and the details of Disney's development processes constitute Disney's trade secrets.

4   Disney derives independent economic value from the information contained in these documents

5   not being generally known outside the company.

6   3.   I declare under penalty of perjury under the laws of the United States that the

7   foregoing is true and correct, and that this declaration was executed this 23rd day of March, 2015,

8   at Los Angeles, California.

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                      /s/ Erin J. Cox
                      ERIN J. COX

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